

October 26, 1992

Ameriflight	Airpac Airlines
United Parcel Service	Burlington Resources
Galvin Flying Service	McCaw Flight Operations
Flightcraft	Nordstrom, Inc.
Aeroflight	

Subject: Use of Ethlene Glycol for Aircraft Deicing

Dear Airport Tenant:

With winter approaching, the deicing of aircraft for safe flight becomes a matter of concern. There is increased interest in the environmental impacts of the use of deicing agents, especially ethylene glycol. The purpose of this correspondence is to clear up any misunderstandings regarding the use of ethlene glycol at Boeing Field.

Federal Aviation Administration (FAA) Advisory Circular 150/5200-30A, Change 1 allows the use of ethlene glycol as a deicing agent on airports; however, the U.S. Environmental Protection Agency (EPA) has established stringent reporting procedures if ethlene glycol is used. EPA publication EPA/540/G-91/003 dated October 1990 and titled "Reporting Requirements for Continuous Releases of Hazardous Substances" is the guide for reporting the use of ethlene glycol. The Comprehensive Environmental Response Compensation and Liability Act (CERCLA) also establishes reporting requirements for the use of ethlene glycol.

Ethlene glycol is a "hazardous substance" and as such under CERCLA 103(a) the release of a reportable quantity (RQ) must be reported immediately to the National Response Center (NRC). The RQ for ethylene glycol is one pound. Aircraft deicing operations result in the release of more than one pound of ethlene glycol; however, deicing agencies need not report to the NRC every time one pound or more of ethlene glycol is used to deice an aircraft. EPA has informally indicated that ethlene glycol releases associated with aircraft deicing may qualify for reduced reporting referred to as "continuous release reporting" under CERCLA 103(1)(2).

There are three basic reporting requirements that deicing agencies must satisfy:

1. A telephone call to the NRC, the State Emergency Response Commission (SERC) and the local emergency planning committee (LEPC) with jurisdiction over the airport.

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2. Within 30 days of the telephone notifications submission of an initial written notification to the EPA Regional Office, SERC and LEPC.
3. A one-time follow-up written report on the anniversary of the initial written report.

Reporting the use of ethylene glycol for aircraft deicing at Boeing Field will be accomplished as follows:

1. **TELEPHONE NOTIFICATION:** Telephone the NRC at 1-800-424-8802. Telephone the Emergency Planning and Community Right-to-Know Hotline (1-800-535-0202) for the telephone numbers of local SERC's and LEPC's. State that the release is "continuous" and that you are reporting the release pursuant to CERCLA 103(f)(2). Identify the airport as Boeing Field/King County International Airport. The NRC staff will provide a case number to be used on all subsequent written reports. Finally, notify Airport Administration (296-7380) that ethylene glycol has been released during aircraft deicing and that all required telephone notifications have been made.
2. **INITIAL WRITTEN REPORT:** Submit an initial written report using enclosed forms to the EPA Regional Office, SERC and LEPC. Reporting instructions can be found in EPA/540/G-91/003 dated October 1990. Addresses of SERC's and LEPC's may be obtained from the Hotline (1-800-535-0202). Copies of all reports will be forwarded to Airport Administration, P.O. Box 80245, Seattle, WA 98108-0245.
3. **ONE-TIME FOLLOW-UP NOTIFICATION:** Within 30 days of the anniversary of the initial written report, agencies must evaluate the reported use of ethylene glycol and submit a one-time report to the appropriate EPA regional office only. Use the same forms used for the initial report. A copy of the report will be forwarded to Airport Administration.

If you have questions or comments, please contact me.

Very truly yours,

Jack Frazelle, A.A.E.  
Assistant Airport Manager

JF/dw

Enclosure